

MICHAEL C. DELL'ANGELO / EXECUTIVE SHAREHOLDER d 215.875.3080 m 610.608.8766 mdellangelo@bm.net

November 12, 2021

VIA ECF

Honorable Lorna G. Schofield United States District Judge Thurgood Marshall U.S. Courthouse 40 Foley Square New York, NY 10007

RE: Contant, et al. v. Bank of America Corp., et al., No. 17-cv-3139

Dear Judge Schofield:

Pursuant to your Honor's October 18, 2021 Order (ECF 501) ("Sealing Oder"), Class Counsel respectfully submit this letter motion requesting permission to file its letter brief requested by the Court (ECF 516) with certain information under seal. Specifically, consistent with Your Honor's Sealing Order, Class Counsel's proposed redactions are limited to the identities of AMA Capital LLC's ("AMA") trading partners and trading volume. Further to your Honor's Rules and Practices, Counsel will file the unredacted version of the letter brief with the proposed highlights under seal. Thereafter, Counsel will file a redacted version of the letter on the record. Lastly, attached to this letter is an appendix that identifies the parties and attorneys of record who should have access to the sealed letter.

Respectfully submitted,

/s/ Michael Dell'Angelo
Michael Dell'Angelo

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Application GRANTED for the reasons identified in the Order at Dkt. No. 501.

The Clerk of Court is respectfully directed to (1) maintain the letter at Dkt. No. 525 under seal with access limited to the parties and attorneys identified in the appendix to this letter and (2) close the motion at Dkt. No. 523.

Dated: November 16, 2021 New York, New York



APPENDIX

Michael Dell'Angelo Michael J. Kane BERGER MONTAGUE PC 1818 Market St, Suite 3600 Philadelphia, PA 19103 Tel: (215) 875-3000 mdellangelo@bm.net mkane@bm.net Counsel for the Class

Damian R. Cavaleri
HOGUET NEWMAN REGAL
& KENNEY, LLP
One Grand Central Place
60 East 42nd Street, 48th Floor
New York, NY 10165
Tel.: 212.689.8808
dcavaleri@hnrklaw.com
Counsel for AMA Capital

Scott O Luskin
PAYNE & FEARS LLP
200 N. Pacific Coast Highway
Suite 825
El Segundo, CA 90245
310-689-1750
sol@paynefears.com
Counsel for AMA Capital